

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**RAYMOND DONNELLY, O'TARA
JOHNSON, AND DANTE WILLIAMS**
Plaintiffs,

v.

ACADEMIC PARTNERSHIPS, LLC,
Defendant.

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Civil Action No. 3:20-cv-1106

**APPENDIX OF EXHIBITS TO DEFENDANT'S MOTION TO OVERRULE/STRIKE
PLAINTIFF DONNELLY'S DISCOVERY OBJECTIONS, MOTION TO COMPEL
PLAINTIFF DONNELLY'S DISCOVERY RESPONSES, AND AWARD
ATTORNEYS' FEES AND BRIEF IN SUPPORT**

Defendant Academic Partnerships, LLC ("AP") files this Appendix of Exhibits to Defendant's Motion to Overrule/Strike Plaintiff Donnelly's Discovery Objections, Motion to Compel Plaintiff Raymond Donnelly's Discovery Responses, and Award Attorneys' Fees and Brief in Support, as follows:

<u>EXHIBIT No.</u>	<u>DOCUMENT DESCRIPTION</u>	<u>APPENDIX No.</u>
A	Plaintiffs' Initial Disclosures	1-6
B	AP's counsel's August 18, 2020 letter to Plaintiffs' counsel regarding Initial Disclosures deficiency	7
C	November 23, 2020 transmittal letter and AP's discovery requests to Plaintiff Raymond Donnelly	8-51
D	December 21, 2020 e-mail exchange with Plaintiffs' counsel regarding request for 30-day discovery response extension	52-54
E	January 22, 2022 e-mail exchange with Plaintiffs' counsel regarding request for a second discovery response extension	55-61
F	Plaintiff Raymond Donnelly's Response to Defendant's First Set of Interrogatories	62-75

G	Plaintiff Raymond Donnelly's Response to Defendant's First Requests for Production	76-114
H	April 27, 2021 discovery deficiency letter to Plaintiffs' counsel	115-133

Respectfully submitted,

/s/ Amanda A. Williams

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**ATTORNEYS FOR DEFENDANT ACADEMIC
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2021, a true and correct copy of the foregoing document was electronically filed with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, and the electronic case filing system sent a “Notice of Electronic Filing” to Plaintiffs’ counsel of record:

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